



March 29, 2016

*VIA CM/ECF*

Ronnie Abrams, United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: Joint Letter Requesting Adjournment of April 1, 2016 Post-Discovery Conference  
Fernandez v. Mizu For Hair New York, LLC, et. al., 15 CV 523

Dear Judge Abrams:

I, along with local counsel from Jackson Lewis P.C., represent Defendants in this action. Together with Plaintiff's counsel, The Harman Firm, L.L.P., the parties jointly request that the post-discovery conference currently scheduled for Friday, April 1, 2016 at 3:30 PM, be adjourned to a date convenient for the Court approximately two (2) months from April 1<sup>st</sup>. Inasmuch as we understand that the Court typically schedules such conferences on Fridays, at the Court's convenience, we suggest the date of Friday June 3, 2016.

The currently scheduled post-discovery conference on April 1<sup>st</sup> was set by Your Honor pursuant to an Order, dated February 1, 2016 (Doc. # 48, attached), and represents a rescheduling of the original post-discovery conference date of January 29, 2016. In setting the April 1<sup>st</sup> conference, Your Honor noted in the Order that should discovery not be complete at that time, the parties may submit a letter seeking further adjournment.

For the past several months, the parties diligently have been engaged in the discovery process and have been addressing discovery disputes with, and since January 29, 2016, providing bi-weekly status updates to, Judge Ellis. Most recently, on March 23, 2016, the parties engaged in a telephone conference with Judge Ellis concerning several issues of outstanding discovery. Inasmuch as certain of these disputes remain outstanding and are not set to be resolved or ruled upon before April 1<sup>st</sup>, Judge Ellis recommended that the parties seek a 2-month adjournment of the April 1<sup>st</sup> post-discovery conference. Please consider this letter requesting adjournment of the post-discovery conference for 2 months to reflect the timing that Judge Ellis suggested.

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We look forward to your Honor's response. Thank you.

Very truly yours,  
/s/  
Susan M. Roberts  
General Counsel

cc: Attorneys Walker Harman, Edgar Rivera, Ronnie Silverberg for Plaintiff.  
Attorneys Wendy Mellk and Lori Jablczynski for Defendants